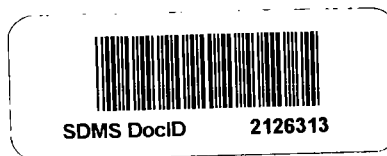




ATOFINA Chemicals, Inc.

Karen Davis  
Law Department



ORIGINAL

Direct Dial: 215-419-7903  
Fax: 215-419-7597  
Secretary: 215-419-5687  
E-Mail: karen.davis@atofina.com

June 2, 2004

05/04/2004

Harry R. Steinmetz (3HS11)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Request for Information in the matter of Safety Light Corporation Site,  
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

This letter is ATOFINA Chemicals, Inc.'s (formerly Pennsylvania Salt Manufacturing Co.) ("ATOFINA") Response to the United States Environmental Protection Agency's ("USEPA") Request for Information regarding the Safety Light Corporation Site in Bloomsburg, Pennsylvania ("Site").

In preparing for this Response, ATOFINA performed a reasonable and diligent search of potentially relevant records in the possession of ATOFINA. This Response is based upon ATOFINA's investigation to date, and should not be construed as an admission of liability in this matter. ATOFINA reserves the right to supplement or amend this Response if additional relevant information arises. ATOFINA also reserves any and all other rights it may have arising out of this Request, including the right to raise any issue or defense.

ATOFINA has located no records that establish a connection between it and the Safety Light Corporation Site. Furthermore, the one-page document provided by EPA, a page from USRC's ledger, does NOT support a claim that Pennsylvania Salt/ATOFINA may be a PRP at this site. The ledger appears to indicate that Pennsylvania Salt purchased product on one occasion from USRC. The product appears to have been returned to USRC, and USRC made the decision to "consign to disposal" the returned product. Therefore based upon the information on the ledger sheet it appears that USRC was the party that "arranged for disposal." While ATOFINA has not located any records indicating that it purchased product from USRC, returning product to a supplier is not a basis for liability under CERCLA.

ATOFINA performed archive searches to locate any documents relating U.S. Radium Corp., USRC, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite,

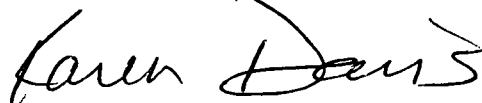
ATOFINA Chemicals, Inc.  
2000 Market Street  
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Safety Light, and Bloomsburg ("Site Names") and did not locate any such documents. ATOFINA performed searches into records maintained by its Research Technical Library for documents related to the Site Names and/or the Company's historic use of Sr-90. ATOFINA did not locate any responsive documents. ATOFINA conducted a database search to locate any contracts that it may have or have had with the Site Names and did not locate any responsive documents. ATOFINA reviewed its Eckhardt Survey responses and did not locate any responsive documents. ATOFINA interviewed an employee with historic knowledge of the Company to see if he recalled any of the Site Names or any processes utilizing Sr-90, to no avail. ATOFINA is a chemical company and does not utilize radioactive materials in its manufacturing operations.

ATOFINA requests that USEPA send to my attention any additional documentation or information which refers or relates to ATOFINA or its predecessors, and which would potentially link ATOFINA to the Safety Light Corporation Site.

Please contact me directly at 215-419-7903 if you have any questions concerning ATOFINA's Response.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Karen Davis".

Karen Davis

KD:pdm

## **GENERAL OBJECTIONS**

ATOFINA objects to each of the Requests for Information and definitions as irrelevant, vague, overbroad, unduly burdensome, and not reasonably calculated to lead to admissible evidence as they seek information beyond the scope of which may be sought under §104(e) of CERCLA.

## **INFORMATION REQUESTED**

1. Describe in detail the business relationship between Atofina Chemical Corporation/Pennsylvania Salt Mfg. Co. and Safety Light.

**ATOFINA has located no records that establish a connection between it and Safety Light. Based on the USRC ledger provided by EPA to ATOFINA, which includes one entry related to Pennsylvania Salt, it appears that Pennsylvania Salt may have purchased a very small amount of Strontium 90 from USRC. At this time, ATOFINA has no information responsive to this Request.**

2. Did Atofina Chemical Corporation/Pennsylvania Salt Mfg. Co. ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by either U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?

**ATOFINA has located no records that establish a connection between it and U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, or Isolite. Therefore, at this time, ATOFINA has no information responsive to this Request.**

3. If you answered "yes" to Question 2, please answer the following questions.

**Not applicable. See Response to Request #2 above.**

4. Did Atofina Chemical Corporation/Pennsylvania Salt Mfg. Co. ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?

**See Response to Request #2 above. ATOFINA Chemicals is a chemical manufacturing company and does not routinely generate radioactive wastes as part of its manufacturing activities.**

5. If you answered "yes" to Question 4, please address the following issues.

**Not applicable. See Response to Request #2 above.**

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility,

current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

**See Response to Request #2 above.**

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

**See Response to Request #2 above.**

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

**See Response to Request #2 above.**

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following.

**See Response to Request #2 above. ATOFINA's Document Retention Policy establishes a retention period of 10 years for Purchase Orders. Accordingly, records of purchases made in 1956 would not be expected to be in Company records in 2004.**

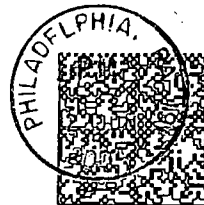


# ATOFINA

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MAILED FROM ZIP CODE 19103

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